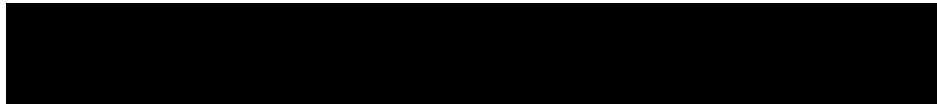


EXHIBIT 7



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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

HEADWATER RESEARCH LLC,

Plaintiff,

v.

MOTOROLA MOBILITY LLC AND LENOVO
(UNITED STATES) INC,

Defendants.

Case No. 4:23-cv-04496-JST

**JOINT STIPULATION AND
MOTION TO STAY PENDING
INSTITUTION DECISIONS ON
INTER PARTES REVIEW OF
THE PATENTS-IN-SUIT**

JOINT STIPULATION AND MOTION TO STAY

Plaintiff Headwater Research LLC (“Plaintiff”) and Defendants Motorola Mobility LLC and Lenovo (United States) Inc. (collectively, “Defendants”) jointly stipulate and move to stay the case pending institution decisions of *inter partes* review (IPR) on the Patents-in-Suit as follows:

WHEREAS, on August 12, 2024, Defendants filed two IPR petitions (IPR2024-01180 and IPR2024-01181) challenging all asserted claims of the two Patents-in-Suit (U.S. Patent Nos. 9,198,076 and 10,749,700);

WHEREAS, on August 16, 2024, Defendants filed a motion to stay pending determination of *inter partes* review of the Patents-in-Suit (Dkt. 70);

WHEREAS, claim construction briefing has not started and will be completed until October 2, 2024 (Dkt 69); the claim construction hearing has been postponed until November 18, 2024; and a trial date has not yet been set (Dkt. 67);

WHEREAS, this Court has granted stays pending IPR before institution. *See, e.g. WirelessWorx IP, LLC v. Google LLC*, No. 23-cv-01852-JST (N.D. Cal. July 18, 2023) (granting a stay prior to institution of IPR); *MindbaseHQ LLC v. Google LLC*, No. 21-CV-03603-JST, 2021 U.S. Dist. LEXIS 253443, at *10 (N.D. Cal. Nov. 1, 2021) (same).

WHEREFORE, IT IS HEREBY STIPULATED, AND THE PARTIES JOINTLY REQUEST THAT THE COURT ORDER THAT:

The Court grants the parties’ joint request to stay the case pending institution decisions of Defendants’ IPR petitions on the Patents-in-Suit. All pending deadlines are stayed. Within seven days of the institution decisions in the IPRs (IPR2024-01180 and IPR2024-01181), the parties are ordered to file a joint case management statement apprising the Court of the institution decisions and requesting such further relief as may be appropriate.

Dated: August 27, 2024

RUSS AUGUST & KABAT

By: /s/ Jason Wietholter
Jason Wietholter
Attorneys for Plaintiff
Headwater Research LLC

1 Dated: August 27, 2024

FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, LLP

By: /s/ Daniel C. Cooley

Daniel C. Cooley

Attorneys for Defendants

Motorola Mobility LLC and

Lenovo (United States) Inc.

[PROPOSED] ORDER

The Court grants the parties' joint request to stay the case pending institution decisions of Defendants' IPR petitions on the Patents-in-Suit. All pending deadlines are stayed. Within seven days of the institution decisions in the IPRs (IPR2024-01180 and IPR2024-01181), the parties are ordered to file a joint case management statement apprising the Court of the institution decisions and requesting such further relief as may be appropriate.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: August 27, 2024

JON S. TIGAR
United States District Judge

ATTESTATION

Counsel for Plaintiff Headwater Research LLC hereby attests by his signature below that concurrence in the filing of this document was obtained from counsel for Defendants Motorola Mobility LLC and Lenovo (United States) Inc.

Dated: August 27, 2024

RUSS AUGUST & KABAT

By: /s/ Jason Wietholter
Jason Wietholter
Attorneys for Plaintiff
Headwater Research LLC

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system.

Dated: August 27, 2024

RUSS AUGUST & KABAT

By: /s/ Jason Wietholter
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Headwater Research LLC